STATE OF MAINE BOARD OF VETERINARY MEDICINE

In Re: Cynthia Cole Teer, DVM)	DECISION AND ORDER
Complaint No. 2019-VET-15799 & 15844)	

I. PROCEDURAL HISTORY

Pursuant to the authority found in 10 M.R.S. Section 8003(5-A), the Maine Board of Veterinary Medicine ("Board") met in public session at its offices in Gardiner, Maine, on September 25, 2019, pursuant to a Notice of Hearing issued on August 20, 2019. The purpose of the meeting was to determine whether to impose discipline upon the suspended veterinary license of Cynthia Cole Teer, DVM.

A quorum of the Board was in attendance during all stages of the proceedings. Participating and voting Board members were Douglas Andrews, DVM; Peter Davis, DVM; Matthew Townsend, DVM; and Chair Donald Hoenig, VMD. Nicholas Pesut, VMD, Complaint Officer for the Board, was present but was seated with the Assistant Attorney General and did not participate in the Board deliberations.

On the morning of the hearing, the Licensee contacted Board staff to indicate that she would arrive late. The hearing start time was delayed to accommodate the Licensee. Although the Licensee appeared after the hearing was scheduled to start and she submitted Licensee Exhibits #1 to #3 at that time, she declined to stay for the proceeding. As such, the Licensee was not present for the hearing. Samantha Morgan, Esq., Assistant Attorney General, prosecuted the matter. Rebekah Smith, Esq., served as Presiding Officer pursuant to a contract with the Department of Professional and Financial Regulation. The hearing was held in accordance with the requirements of the Maine Administrative Procedure Act, 5 M.R.S. Section 9051 to Section 9064. The Notice of Hearing

indicated that the Licensee's failure to appear could result in a hearing in absentia or disposition by default.

Prosecution Exhibits #1 to #13 and Licensee Exhibits #1 and #2¹ were admitted without objection and are identified as follows.

Prosecution Exhibit #1: Notice of Hearing issued August 20, 2019

Prosecution Exhibit #2: ALMS Licensing Data

Prosecution Exhibit #3: Complaint filed July 11, 2019

Prosecution Exhibit #4: Notice of Complaint dated July 11, 2019 Prosecution Exhibit #5: Notice of Complaint dated July 16, 2019

Prosecution Exhibit #6: Complaint filed July 18, 2019

Prosecution Exhibit #7: Notice of Complaint dated July 26, 2019 Prosecution Exhibit #8: Decision and Order dated June 20, 2019

Prosecution Exhibit #9: Consent Agreement effective December 11, 2018

Prosecution Exhibit #10: 10 M.R.S. § 8003(5-A)

Prosecution Exhibit #11: 32 M.R.S. § 4860

Prosecution Exhibit #12: 32 M.R.S. § 4853

Prosecution Exhibit #13: Board Rules Chapter 7

Licensee Exhibit #1: Treatment Notes for Gary, owned by Tanya Brown, dated June 17, 2019, through August 12, 2019

Licensee Exhibit #2: Treatment Notes for Minnie, owned by Margaret Hinkle, dated July 12, 2019, through July 18, 2019

The Board took notice of its statutes and rules and confirmed that no participating member had any conflict of interest or bias that would prevent him from rendering an impartial decision in this matter. The Prosecution did not object to the participation of a Board member. The Prosecution presented an opening statement. The Prosecution presented the following witnesses: Cathy Neumann, Complaint Coordinator for the Office of Professional and Occupational Regulation; Thomas Avery, Chief Field Investigator for the Office of Professional and Occupational Regulation; William Newcomb, DVM; Michelle Hagar, DVM (by phone); and Charlsey Davis, Pet Owner. All testimony was taken under oath. The Prosecution made a closing argument. The Prosecution had the burden to prove the allegations in the Notice of Hearing by a preponderance of

¹ The Licensee agreed to the redaction in Licensee Exhibit #2 requested by the Prosecution. Licensee Exhibit #3, which pertained to a complaint not before the Board in the present hearing, was excluded on the basis of relevance.

the evidence. The Board then deliberated and made the following findings of fact and conclusions of law by a preponderance of the credible evidence regarding the allegations against the Licensee.

II. FINDINGS OF FACTS

The Licensee was first licensed as a veterinarian in Maine in 2002. (Pros. Exh. #2.) The Licensee did not hold an active license between January 24, 2018, and June 20, 2019. (Pros. Exh. #2.) The Licensee was granted a license on June 20, 2019, pursuant to a Decision and Order of the Board, although the license was suspended for a period of one year. (Pros. Exh. #2.) The Licensee's license granted on June 20, 2019, expired on September 30, 2019. (Pros. Exh. #2.) The Licensee has not filed a renewal application. (Pros. Exh. #2; Administrative File; Testimony of Avery.) The Licensee practices in a solo veterinary practice, with one employee who is a secretary/receptionist, at Machias Animal Hospital. (Pros. Exh. #6; Testimony of Avery.)

On September 27, 2017, the Licensee applied for renewal of licensure as a veterinarian. (Pros. Exh. #8.) On December 11, 2017, the Licensee's renewal application was denied based on her failure to comply with a January 15, 2014, Decision and Order of the Board. (Pros. Exh. #8.) The Licensee did not appeal the preliminary denial and thus on January 24, 2018, a final denial of the Licensee's license renewal application was issued. (Pros. Exh. #8.) The Licensee was notified in person, over the phone, and by letter that her license renewal application had been denied by the Board. (Pros. Exh. #8.) The Licensee continued to practice veterinary medicine. (Pros. Exh. #8.) On May 9, 2018, the Licensee filed a new application for licensure. (Pros. Exh. #8.) A Notice of Preliminary Denial was issued on June 6, 2018, on the basis that the Licensee had continued to practice veterinary medicine after the January 24, 2018, final denial of her license renewal application. (Pros. Exh. #8.) On August 6, 2018, the Superior Court issued an order granting the Attorney General's motion for a preliminary injunction and ordering the Licensee to immediately cease any acts that constituted the practice of veterinary medicine unless she became licensed to do

so. (Pros. Exh. #8.) The Licensee continued to treat patients after the August 6, 2018, Superior Court injunction prohibiting her from practicing without a license. (Pros. Exh. #8.)

On October 25, 2018, the Licensee signed a Consent Agreement with the Board and the Office of the Attorney General in which she acknowledged failing to submit patient records to the Board as required by a January 15, 2014, Decision and Order of the Board. (Pros. Exh. #9.) The Licensee acknowledged that her renewal application of September 22, 2017, had been preliminarily denied by the Board; she had received the Notice of Preliminary Denial issued on December 11, 2017; and she was sent a final denial and received oral communication regarding the final denial, yet she continued to practice veterinary medicine. (Pros. Exh. #9.) The Licensee also acknowledged several actions in caring for animals that qualified as gross negligence, incompetence, misconduct, or a violation of a code of ethics or standard of practice. (Pros. Exh. #9.) Pursuant to the Consent Agreement, a reprimand and a civil penalty of \$10,000, due at the time of execution of the Consent Agreement, were imposed on the Licensee and a five-year minimum period of probation was imposed during which the Licensee was subject to continuing education requirements, records submission, and practice monitoring. (Pros. Exh. #9.) The Consent Agreement dictated that "[p]rior to engaging in the practice of veterinary medicine, Dr. Teer must engage a veterinary practice monitor who shall monitor her veterinary practice." (Pros. Exh. #9.) The Licensee was required to obtain prior approval of the Board's Complaint Officer for her practice monitor. (Pros. Exh. #9.) Finally, the Consent Agreement required the Licensee to appear before the Board on meeting dates determined by the Board not more than twice per year. (Pros. Exh. #9.) In the Consent Agreement, the Board agreed that upon receipt of the signed Consent Agreement, payment of the civil penalty, and the Board Complaint Officer's approval of a practice monitor, the Board would issue the Licensee's veterinary license. (Pros. Exh. #9.)

On December 7, 2018, the Superior Court issued a Judgment and Order on Motion for Permanent Injunction permanently enjoining the Licensee from practicing veterinary medicine without a license. (Pros. Exh. #8.)

The Consent Agreement signed by the Licensee on October 25, 2018, became effective on December 18, 2018, with the final signature. (Pros. Exh. #9.) The Licensee paid the \$10,000 civil penalty. (Pros. Exh. #6.) Because the Licensee did not obtain the approval of the Board's Complaint Officer for a practice monitor, her license was never issued; nevertheless, she continued to practice veterinary medicine. (Pros. Exh. #6.)

On January 30, 2019, although no license had been issued to her, the Licensee administered a rabies vaccine to Bailey, a dog owned by Jeanette Parks. (Pros. Exh. #3.) On February 20, 2019, the Licensee administered a rabies vaccine to Ebony, a dog downed by Derrick Maxine. (Pros. Exh. #3.) On March 19, 2019, the Licensee administered a rabies vaccine to Minnie, a dog owned by Margaret Hinkle. (Pros. Exh. #3; Testimony of Hagar.) On May 21, 2019, the Licensee administered a rabies vaccine to Bubba, a dog owned by Jesse Redman. (Pros. Exh. #3.) Each of the certificates for these rabies vaccinations included the Licensee's signature and veterinarian license number, although the Licensee's license was not active throughout this period. (Pros. Exh. #3; Testimony of Avery.)

On May 22, 2019, the Board held a hearing to address additional allegations of unlicensed practice against the Licensee, among other allegations, and to determine the outcome of the Licensee's appeal from the preliminary denial of her most recent application for licensure. (Pros. Exh. #8.)² The Licensee acknowledged that she had practiced veterinary medicine on all of the

² Although the Consent Agreement had been executed to grant the Licensee's appeal from the preliminary denial of her application and issue her a license, because she had not met the conditions in the Consent Agreement, a license was never issued and her appeal of the preliminary denial was considered still pending.

dates alleged in the complaints referenced in the Notice of Hearing. (Pros. Exh. #8.) After a hearing at which the Licensee was represented by counsel, the Board found that the Licensee had practiced veterinary medicine on many occasions and on a regular basis between January 24, 2018, and May 22, 2019, as evidenced by testimony, medical records, and prescription medication records, even though she had been informed on many occasions by the Board and the Superior Court that she did not hold a license to practice veterinary medicine. (Pros. Exh. #8.) The Board also found that the Licensee intentionally misrepresented the status of her license by treating animals without telling their owners that she did not hold a license on many occasions between January 24, 2018, and May 22, 2019. (Pros. Exh. #8.) In addition, the Board found that the Licensee had continued to act in a capacity requiring a license and had failed to produce to the Board requested documents under her control by the deadlines set by the Board. (Pros. Exh. #8.)

The Board granted the Licensee's renewal application but suspended her license for 360 days; the Board allowed up to 180 days of the suspension to be stayed upon the Licensee's completion of a mental health evaluation and 24 hours of continuing education, her securing of a practice monitor approved by the Board's Complaint Officer, and her appearance before the Board at its September 2019 meeting. (Pros. Exh. #8.) Finally, the Board noted that if it were to receive a substantiated complaint of unlicensed practice by the Licensee during the period of license suspension, it would be very likely to revoke the Licensee's license. (Pros. Exh. #8.) The Board rendered its oral decision on May 22, 2019, which was effective with the Board's issuance of a written Decision and Order on June 20, 2019. (Pros. Exh. #8.) On June 21, 2019 the Decision and Order was provided by email to the Licensee and to her attorney and was sent by first class and certified mail to the Licensee at her address on file with the Board and to her attorney. (Pros. Exh. #8; Testimony of Neumann.) Although the receipt is undated, the Licensee signed for the certified mail Decision and Order. (Pros. Exh. #8.) A staff member at the Licensee's attorney's office signed

for the certified mail copy of the Decision and Order on June 24, 2019. (Pros. Exh. #8.) The first class mail version of the Decision and Order sent to the Licensee was not returned to the Board as undeliverable. (Testimony of Neumann.) The emailed copy of the Decision and Order sent to the Licensee's email address on file with the Board was opened for reading on June 22, 2019. (Pros. Exh. #8; Testimony of Neumann.)

On June 21, 2019, the Licensee administered rabies vaccines to Rosie and Willie Nelson, dogs owned by Charlsey Davis. (Pros. Exh. #3; Testimony of Davis.) Ms. Davis had called Machias Animal Hospital a couple of weeks prior to the appointment to make sure they could administer rabies vaccines, which she was informed they could. (Testimony of Davis.) Ms. Davis personally observed the Licensee administer the rabies vaccines to Rosie and Willie Nelson. (Testimony of Davis.) The Licensee did not, however, provide Ms. Davis with rabies vaccination tags to place on her dogs' collars. (Testimony of Davis.) When Ms. Davis subsequently registered her animals in her municipality, she was asked about the rabies vaccination tag numbers, which were not on the certificates. (Testimony of Davis.) Ms. Davis called Machias Animal Hospital to ask why the rabies vaccination certificates did not contain tag numbers; the Licensee informed her that the tags were on back order. (Testimony of Davis.) At the time of hearing, Ms. Davis had not been provided tags by the Licensee. (Testimony of Davis.)

On June 28, 2019, William Newcomb, DVM, of Little River Veterinary Clinic saw Gary, a dog owned by Tanya Brown, for a second opinion regarding an ongoing cough. (Pros. Exh. #3; Testimony of Newcomb.) Ms. Brown told Dr. Newcomb that Gary had been treated by the Licensee approximately two months prior to check his heart and on June 17, 2019, to address a cough he had developed. (Pros. Exh. #3; Testimony of Newcomb.) On June 17, the Licensee had prescribed three medications to Gary, which Ms. Brown brought to her appointment with Dr. Newcomb. (Pros. Exh. #3; Testimony of Newcomb.) The prescriptions were handwritten in a

manner consistent with what Dr. Newcomb had seen on prescriptions from Machias Animal Hospital in the past. (Pros. Exh. #3; Testimony of Newcomb.) Because Gary was still coughing, Dr. Newcomb performed a chest x-ray and determined that Gary was experiencing pulmonary edema, for which he issued a prescription. (Pros. Exh. #3; Testimony of Newcomb.)

On July 8, 2019, Kevin Brodee, Animal Control Officer for the town of East Machias, reported to the Board that the East Machias Town Office had processed rabies vaccination certificates issued by the Licensee that did not contain the number of the tag that should have been given to each dog owner for placement on the dog's collar. (Pros. Exh. #3.) The dog owners, when asked by Town Hall staff about this issue, indicated that they had been told by the Licensee that the tags were on back order. (Pros. Exh. #3.)

On July 11, 2019, Chief Board Investigator Thomas Avery filed a complaint against the Licensee. (Pros. Exh. #3.) Investigator Avery alleged that the Licensee had continued to practice veterinary medicine without a license. (Pros. Exh. #3.)

Also on July 11, 2019, Investigator Avery's complaint was forwarded to the Licensee by first class mail. (Pros. Exh. #4.) The Notice of Complaint instructed the Licensee to file a detailed response, including all diagnostic and treatment records pertaining to the animals described in the complaint, by August 13, 2019. (Pros. Exh. #4.) On July 16, 2019, Investigator Avery's complaint was again forwarded to the Licensee, this time by first class mail, certified mail, and registered email, and a new deadline of August 18, 2019, was set for the Licensee's response. (Pros. Exh. #4.) The Licensee did not file a response or provide any treatment records by August 18, 2019. (Testimony of Neumann.) On the day of the hearing, the Licensee for the first time provided a canine medical record for Gary indicating that she had examined him on June 17, 2019, and provided several medications. (Lic. Exh. #1; Testimony of Neumann.)

On July 18, 2019, Michelle Hagar, DVM, a veterinarian at Little River Animal Hospital, filed a complaint with the Board regarding the Licensee. (Pros. Exh. #6.) Dr. Hagar reported that on July 17 she treated Margaret Hinkle's dog Minnie, who had been treated by the Licensee on July 12. (Pros. Exh. #6; Testimony of Hagar.) On July 12, the Licensee had informed Ms. Hinkle that Minnie was suffering from a tick-borne illness and needed to be treated with Doxycycline and Gabapentin. (Pros. Exh. #6; Testimony of Hagar.) The receipt given to Ms. Hinkle, however, indicated that the Lyme's disease test performed on Minnie was negative. (Pros. Exh. #6; Testimony of Hagar.) In addition, the amount of Doxycycline provided was sufficient to last only 10 days even though standard treatment for Lyme's disease would be 28 to 30 days of the medication. (Pros. Exh. #6; Testimony of Hagar.) Further, Dr. Hagar concluded that Minnie was actually suffering from pancreatitis. (Pros. Exh. #6; Testimony of Hagar.)

On July 24, 2019, Ms. Hinkle confirmed to Investigator Avery that the Licensee had treated Minnie about a week before Minnie was seen by Dr. Hagar. (Pros. Exh. #6.) Ms. Hinkle indicated that she paid the Licensee's bill by credit card and received an undated receipt in return, which she provided to Investigator Avery. (Pros. Exh. #6.)

Dr. Newcomb and Dr. Hagar consider the prescribing of medications and the administration of vaccines to animals to be the practice of veterinary medicine. (Testimony of Newcomb; Testimony of Hagar.)

On July 26, 2019, the Board issued a Notice of Complaint to the Licensee regarding Dr. Hagar's complaint. (Pros. Exh. #7.) The Notice of Complaint directed the Licensee to file a detailed response, including all diagnostic and treatment records for the animal described in the complaint, by August 2, 2019. (Pros. Exh. #7.) The complaint was scheduled to be presented to the Board at its August 5, 2019, meeting. (Pros. Exh. #7.) The Licensee did not file a response or provide any treatment records by August 2, 2019. (Testimony of Neumann.) On the day of hearing,

the Licensee for the first time produced a canine medical record for Minnie indicating that the Licensee examined Minnie on July 12, 2019, and prescribed several mediations. (Lic. Exh. #2; Testimony of Neumann.)

On September 10, 2019, Investigator Avery visited Machias Animal Hospital. (Testimony of Avery.) He observed a dog enter the facility with its owner and he subsequently entered. (Testimony of Avery.) Renee, the Licensee's only employee of which Investigator Avery is aware, asked him to wait in the waiting room. (Testimony of Avery.) Renee then went out back and returned to tell Investigator Avery that the Licensee was grooming an aggressive dog and was not available to speak to him. (Testimony of Avery.) Investigator Avery provided Renee with a folder that contained three documents: an application so that the Licensee could apply to renew her suspended veterinary license, which was due to expire on September 30, 2019; the Notice of Hearing regarding the September 25, 2019, hearing; and a Notice to Appear at the September 25, 2019, Board meeting pursuant to the Board's June 20, 2019, Decision and Order to report on her compliance with the Decision and Order. (Testimony of Avery.)

On September 25, 2019, the Licensee appeared late for the hearing and produced medical records for Minnie, owned by Margaret Hinkle, and Gary, owned by Tanya Brown. (Lic. Exhs. #1 & #2; Testimony of Neumann.) The Licensee was informed that if she were to leave, the hearing would proceed without her. (Testimony of Neumann.) No attorney entered an appearance to represent the Licensee regarding the hearing held on September 25, 2019. (Testimony of Neumann.)

III. GOVERNING STATUTES AND RULES

- 1. The Board's sole purpose is to protect the public health and welfare. 10 M.R.S. § 8008.
- 2. The Board may deny licensure or impose discipline upon a licensee who violates a law of the Board. 10 M.R.S. § 8003(5-A)(A)(4).

- 3. The Board may deny licensure or impose discipline upon a licensee who violates a rule of the Board. 10 M.R.S. § 8003(5-A)(A)(5).
- 4. The Board may deny licensure or impose discipline upon a licensee who continues to act in a capacity requiring a license under the governing law of the Board after expiration, suspension, or revocation of that license. 10 M.R.S. § 8003(5-A)(A)(7).
- 5. The Board may deny licensure or impose discipline upon a licensee who fails to produce to the Board any requested documents in the licensee's possession or under the licensee's control concerning a pending complaint or proceeding or any matter under investigation. 10 M.R.S. § 8003(5-A)(A)(10).
- A person may not practice veterinary medicine in Maine who is not a licensed veterinarian
 or the holder of a permit for the performance of relief veterinary service issued by the Board.
 M.R.S. § 4860.
- 7. The practice of veterinary medicine is defined as the diagnosis, treatment, correction, change, relief or prevention of animal disease, deformity, defect, injury or other physical or mental condition, including the prescription or administration of a drug, medicine, biologic, apparatus, application, anesthetic or other imaging, therapeutic or diagnostic technique or nutritional substance or technique on, for or to any animal, including, but not limited to, acupuncture, dentistry, homeopathic or chiropractic procedures, physical or massage therapy, surgery including elective surgery of any manual, mechanical, biological or chemical procedure used for pregnant testing or correcting sterility or infertility. 32 M.R.S. § 4853(7)(A). The practice of veterinary medicine also includes the representation directly or indirectly of an ability and willingness to perform an act included in the definition of the practice of veterinary medicine. 32 M.R.S. § 4853(7)(C). Further, the use of any titles, word or abbreviations of letters in a manner or under circumstances that induce the belief

- that the person using them is legally authorized and qualified to perform any act included in the definition of the practice of veterinary medicine constitutes the practice of veterinary medicine. 32 M.R.S. § 4853(7)(D).
- 8. The Board's Code of Ethics states that a licensee may not intentionally misrepresent the type or status of license held or qualifications to practice. (02-285) Rules of Board of Veterinary Medicine, Chapter 7, Section 12.
- 9. Among other forms of discipline for a violation, the Board may impose a reprimand, may revoke a license, and may impose a civil penalty of up to \$1,500 per violation of applicable laws, rules, or conditions of licensure or for each instance of actionable conduct or activity. 10 M.R.S. § 8003(5-A)(B)(2)(4) & (5).

IV. CONCLUSIONS OF LAW

The Board, considering the above facts and those alluded to in the record but not referred to herein, concluded that it had jurisdiction over licensee Cynthia Cole Teer, DVM, and found as follows by unanimous vote:

- 1. The Licensee practiced veterinary medicine on July 12, 2019, after her receipt of the June 30, 2019, Decision and Order, even though her license was suspended, by performing an examination on and providing medication for Minnie, a dog owned by Margaret Hinkle, as evidenced by testimony and medical records, in violation of 32 M.R.S. Section 4860, subjecting her to discipline pursuant to 10 M.R.S. Section 8003(5-A)(A)(4).
- 2. The Licensee intentionally misrepresented the status of her veterinarian license by treating animals without telling their owners that she did not hold a license on many occasions between January 24, 2018, and the hearing on September 25, 2019, as evidenced by her administration of rabies vaccinations on January 30, February 20, March 19, May 21, and June 21, 2019; her treatment of animals on June 17 and July 12, 2019; and her holding out

Machias Animal Hospital as available to treat animals and administer vaccines, in violation of Board Rules, Chapter 7, Section 12, subjecting her to discipline pursuant to 10 M.R.S. Section 8003(5-A)(A)(5).

- 3. The Licensee continued to act in a capacity requiring a license under the governing law of the Board after her license was granted but suspended effective June 20, 2019, by her performance of an examination on and providing of medication to Minnie, a dog owned by Margaret Hinkle, on July 12, 2019, subjecting her to discipline pursuant to 10 M.R.S. Section 8003(5-A)(A)(7).
- 4. The Licensee failed to produce to the Board requested documents in the Licensee's possession or under her control concerning Complaint Number 2019-VET-15799 (July 11, 2019, complaint of Investigator Avery) by the deadline of August 18, 2019 and 2019-VET-15844 (July 18, 2019, complaint of Dr. Michelle Hagar) by the deadline of August 2, 2019, subjecting her to discipline pursuant to 10 M.R.S. Section 8003(5-A)(A)(10).

The Board unanimously imposed the following sanctions upon the Licensee's license for the above four violations:

- 1. Revocation of the Licensee's license.
- 2. Imposition of a reprimand on the License.
- 3. Imposition of a civil penalty of \$1,500 per statutory violation,³ for a total of \$6,000, payable within one year of the effective date of this Decision and Order. Payment of the civil penalty shall be remitted to the attention of Cathy Neumann, Complaint Coordinator, Maine

³ Pursuant to 10 M.R.S. Section 8003(5-A)(B)(5), the Board was authorized to impose a civil penalty of \$1,500 for each instance of actionable conduct. Nevertheless, the Board limited the civil penalty to one for each of the four statutory violations even though at least two of the violations were committed on multiple occasions.

Department of Professional and Financial Regulation, 35 State House Station, Augusta, Maine 04333-0035 by check or money order payable to the Treasurer, State of Maine.

The effective date of this Decision and Order is the date on which it is signed by the Chair of the Board.

Dated: 6 cb 16, 2019

Donald Hoenig, VMD, Chair

State of Maine Board of Veterinary Medicine

V. APPEAL RIGHTS

Pursuant to the provisions of 10 M.R.S. Section 8003(5-A) and 5 M.R.S. Sections 11001 to 11003, any party that appeals this Decision and Order must file a Petition for Review in the Superior Court within 30 days of receipt of this Order. The petition shall specify the person seeking review, the manner in which they are aggrieved, and the final agency action which they wish reviewed. It shall also contain a concise statement as to the nature of the action or inaction to be reviewed, the grounds upon which relief is sought, and a demand for relief. Copies of the Petition for Review shall be served by certified mail, return receipt requested, upon the State of Maine Board of Veterinary Medicine, all parties to the agency proceedings, and the Attorney General.